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MAY 14 2025

CLERK, U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTA

10 UNITED STATES DISTRICT COURT
11 FOR THE DISTRICT OF MINNESOTA

12 Steve Salvador Ybarra
13 Self-Represented
14 Pro Se Litigant,

15 Plaintiff,

16 v.

17 Legal Assistance of Dakota County;
18 Sharon Jones Esq., in her Individual and
19 Official capacities;
20 Hon. David Lutz, in his individual and
21 Official capacities;
22 Hon. Tanya Obrien, in her individual and
23 official capacities;
24 Hon. Danna L Edwards, in her individual
25 and official capacities;
26 Lydia Clemens, in her individual and
27 official capacities;
28 Michelle Cathleen Ybarra,

Defendants.

No. . 0:25-cv-01948-KMM-DJF

**NOTICE OF INTENT TO PROPOND
TARGETED DISCOVERY UPON
RESOLUTION OF PRELIMINARY
INJUNCTION MOTION**

TO THE COURT AND ALL PARTIES:

Plaintiff Steve Salvador Ybarra, proceeding pro se, respectfully submits this Notice of Intent to Propound Targeted Discovery. In the interest of transparency and procedural clarity, Plaintiff provides notice that, should this matter proceed beyond the current phase of preliminary

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U.S. DISTRICT COURT MPI

injunction briefing, he intends to promptly serve narrowly tailored discovery demands directed at the following categories:

1. Guardian ad Litem (GAL) Communications and Authorship Metadata:

- All emails, drafts, and digital authorship data relating to the October 11, 2024 GAL Report authored by Defendant Lydia Clemens, including metadata identifying participation or contribution by Sharon Jones or any other party affiliated with Legal Assistance of Dakota County.

2. Legal Assistance of Dakota County (LADC) Internal Discussions Regarding Affidavit Fraud:

- Communications, strategy memos, and internal notes addressing Plaintiff's sealed filings, IFP eligibility challenges, or Sharon Jones' ghostwriting of affidavits submitted in the state custody matter.

3. Sealed Filings and Orders Relating to Index #312:

- All sealed pleadings, rulings, and internal judicial memoranda referencing Index #312, which Plaintiff alleges is tied to concealed perjury and procedural fraud.

4. Intake Eligibility and Financial Qualification Documentation:

- Records concerning income verification, public aid eligibility, and LADC intake assessments related to Michelle Cathleen Ybarra, including all submitted or reviewed pay stubs and related disclosures.

5. Judicial Communications Involving Raymond Mestad:

- All emails, directives, and records of communication between Dakota County judicial clerk Raymond Mestad and any judicial officer or staff concerning Plaintiff's filings, pending motions, and reports of GAL misconduct.

This discovery is necessary to further substantiate Plaintiff's allegations under 42 U.S.C. §§ 1983, 1985, and 18 U.S.C. § 1962(d), and is particularly relevant given the demonstrable concealment of evidence and procedural abuse that form the factual basis of this federal civil rights action.

Respectfully submitted,

/s/ **Steve Salvador Ybarra**

Steve Salvador Ybarra

Pro Se Litigant

California | Minnesota

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Phone: (612) 544-4380

CERTIFICATE OF SERVICE

I hereby certify that on **May 13, 2025**, I served a true and correct copy of the attached:
**NOTICE OF INTENT TO PROPOND TARGETED DISCOVERY UPON
RESOLUTION OF PRELIMINARY INJUNCTION MOTION**

upon the following parties by email and/or U.S. Mail:

- **Legal Assistance of Dakota County**

Email: admin@dakotalegal.org

- **Sharon Jones, Esq.**, in her individual and official capacities

Legal Assistance of Dakota County

Email: sjones@dakotalegal.org

- **Hon. David Lutz**, in his individual and official capacities

Dakota County District Court

1560 Highway 55, Hastings, MN 55033

Email: Raymond.mestad@courts.state.mn.us

- **Hon. Tanya O'Brien**, in her individual and official capacities

Dakota County District Court

1560 Highway 55, Hastings, MN 55033

Email:

- **Hon. Dannia L. Edwards**, in her individual and official capacities

1 Dakota County District Court

2 1560 Highway 55, Hastings, MN 55033

3 Email:

- 4 • **Lydia Clemens**, Guardian ad Litem, in her individual and official capacities

5 First Judicial District GAL Program

6 Email: Lydia.clemens@courts.state.mn.us

- 7 • **Michelle Cathleen Ybarra**, Respondent

8 Email: shellbell@hotmail.com

9 This notice was served to all named parties via email where available and U.S. Mail where
10 necessary, consistent with Fed. R. Civ. P. 5(b) and Local Rule 7.1.

11 Respectfully submitted,

12 /s/ **Steve Salvador Ybarra**

13 Pro Se Litigant

14 Steve@TheoryWerkx.com

15 (612) 544-4380

16 Executed May 12, 2025